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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION**

CHRISTINE KAY CROSSLEY,)	Case No.: 1:21-CV-01686-EPG
)	
Plaintiff,)	STIPULATION FOR AN EXTENSION OF
)	TIME; ORDER
vs.)	
)	
KILOLO KIJAKAZI,)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant shall have a 35-day extension of time, from Monday, July 4, 2022, to Monday, August 8, 2022, for Defendant to respond to Plaintiff's Motion for Summary Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

This is Defendant's first request for an extension of time. Defendant respectfully requests this extension because the undersigned attorney is still new to the agency, his work must be reviewed by a more senior attorney prior to filing with the Court, and both he and his reviewer

1 require additional time to complete the review process and manage competing workload
2 demands, including other district court briefs and Ninth Circuit briefs due in July. This request is
3 made in good faith with no intention to unduly delay the proceedings. Plaintiff does not oppose
4 the requested extension.

5 WHEREFORE, Defendant requests until Monday, August 8, 2022, to file her opposition
6 to Plaintiff's opening brief.

7 Respectfully submitted,

8 Dated: June 28, 2022

/s/ Francesco Benavides*

9 FRANCESCO BENAVIDES

Attorney for Plaintiff

10 *as authorized via e-mail on June 28, 2022

11 Dated: June 28, 2022

PHILLIP A. TALBERT

12 United States Attorney

PETER K. THOMPSON

13 Acting Regional Chief Counsel, Region IX

14 Social Security Administration

15 By: /s/ Bacilio Mendez II

16 BACILIO MENDEZ II

Special Assistant United States Attorney

17 Attorneys for Defendant
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ORDER

Pursuant to the parties' stipulation (ECF No. 13), IT IS HEREBY ORDERED that the deadline for Defendant to respond to Plaintiff's opening brief is continued to August 8, 2022. All remaining deadlines in the Scheduling Order (*see* ECF No. 5) are extended accordingly.

IT IS SO ORDERED.

Dated: **June 28, 2022**

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE